

**BERRY APPLEMAN & LEIDEN**

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Student DOE #1

Plaintiff,

v.

Donald J. TRUMP, in his official  
capacity, President of the United  
States of America;

John TSOUKARIS, in his official capacity  
as ICE Enforcement and Removal  
Operations New Jersey Field Office  
Director;

Todd M. LYONS, in his official capacity,  
Acting Director, Immigration and  
Customs Enforcement, U.S. Department  
of Homeland Security; and

Kristi NOEM, in her official capacity,  
Secretary, U.S. Department of Homeland  
Security;

Defendants.

Case No. 2:25-cv-02825-MCA-LDW

**PROPOSED EXPEDITED BRIEFING  
AND HEARING DATES ON  
EMERGENCY MOTION FOR  
TEMPORARY RESTRAINING ORDER**

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Pursuant to this Court's text order (ECF 16), parties have conferred and propose the following change to the existing briefing schedule and proposed hearing dates on the Emergency Motion for Temporary Restraining Order.

Defendants' response to the Emergency Motion for Temporary Restraining Order is currently due on April 25, 2025 with Plaintiff's reply due on April 30, 2025.

Plaintiff proposes to expedite the due date of the Plaintiff's reply brief to 12:00 PM on Monday, April 28<sup>th</sup>.

Plaintiff and Defendants then propose that the Court schedule the hearing on the Emergency Motion and pleadings for the afternoon of April 30, 2025 or anytime on May 1, 2025.

Dated: April 21, 2025

Respectfully submitted,  
/s/ Jeff Joseph  
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